

EXHIBIT F

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE MIDDLE DISTRICT OF TENNESSEE

4 MARGARET CRAIG, as next of)
5 kin and personal)
6 representative of the)
7 estate of Angela Hulsey,)
8)
9 Plaintiff,)
10)
11 vs.) Docket No.:3:17-cv-01335
12)
13 CHEATHAM COUNTY, TENNESSEE,) JUDE CAMPBELL/
14 BEN MOORE; MARK BRYANT;) MAGISTRATE JUDGE HOLMES
15 STEPHANIE GIZZI-BELL,)
16 JESSICA PLANK, KEITH) JURY DEMAND
17 PFEIFFER; MICHAEL)
18 MONTGOMERY; JUSTIN PAUL;)
19 BRANDON REASONOVER; TASHA)
20 BIGGS; HARLEY GEROW; JOSH)
21 MARRIOTT; JEFFREY GOAD;)
22 JUDY KING; ROGER TEMPLE;)
23 JEFF KEY; and JAMES BARNUM,)
24)
25 Defendants.)

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17
18 **THE DEPOSITION OF MS. TIA ALEXIS NEWMAN**

19 January 9, 2019

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23 SCHAFER REPORTING SERVICE
24 JILL A. SCHAFER, RPR
25 P.O. Box 3214
 Jackson, Tennessee 38303
 (731) 668-6880

1 was having to help bathe her in the shower. She was so
2 weak she couldn't even brush her hair out. I had to
3 brush her hair out for her.

4 Q Okay. So when you -- when you saw her, she
5 indicated to you that she had not seen anybody in
6 medical yet?

7 A Uh-huh. That's what she told me.

8 Q And if -- if you want to see somebody in medical,
9 do -- is there any way that you get on a list or get to
10 see the nurse?

11 A Oh, I mean --

12 Q How does that happen?

13 A -- you write out on the kiosk that's in the --
14 that's in the dorm, and usually you're seen, like, the
15 next day unless she's got a long list, and it might be
16 a couple of days.

17 Q Okay. And so did Ms. Hulsey make any attempt to
18 fill out the kiosk?

19 A I can't say. I'm not sure if she did or not.

20 Q Okay. Did -- do you know if she ever requested
21 any medical treatment?

22 A Yeah. She -- now, she told the officers numerous
23 times that she did not feel right. She kept telling
24 them, "I feel like I'm dying." And Harley -- Miss
25 Harley was the one that -- was one of the ones that was

1 there.

2 I don't know Harley's last name, but she told her
3 several times -- because Angela's bed was right beside
4 mine. Angela was in a boat -- in a boat right beside
5 my bunk. I was in a bunk, and she was in a boat beside
6 the toilet and the shower.

7 And she kept telling Harley that -- she said, "I
8 feel like I'm dying. I feel like I'm dying." And
9 Harley just kept blowing her off. She said -- this was
10 her exact words. She said, "You just feel like you're
11 dying. You're not dying. You just feel like you are."

12 And any of the other officers would just tell
13 you -- because this is what the nurse tells them to
14 tell us, I believe, is to "Drink water and lay down,
15 and you'll feel better."

16 Q Okay. So is that what Ms. Hulsey was told?

17 A I can't say yes or no, but I -- I mean, I believe
18 so. I would say so because that's what every inmate is
19 told, I mean, honestly.

20 If something going wrong, the main answer they
21 come up with is "Drink water and lay down." But they
22 should have been able to look at her and tell. They --
23 they just should have gave her medical treatments.
24 It's a shame they didn't.

25 Q Okay. And so when -- do you remember when that

1 was that she said something to Miss Harley?

2 A Do I remember when?

3 Q Yeah. How many days she'd been in the -- in the
4 back.

5 A No. I'm not sure.

6 Q Do you remember how long she was in the back with
7 you?

8 A Now, I know she was only there for -- on a
9 misdemeanor charge. And that -- you're no -- you're
10 not there longer than a week on a misdemeanor charge
11 usually unless you go to court and they put you off.

12 But I believe she might have been back there with
13 me probably three or four days.

14 Q Okay. So do you remember her telling anyone else
15 besides Miss Harley that she felt like she was dying or
16 didn't feel well?

17 A She told Mark. Now, I don't know Mark's last
18 name. I think it may be Bryant. I can't remember.
19 He's the one that got indicted for tasing that boy or
20 whatever.

21 Q Okay. And so -- and you know it was Mark because
22 you knew his name?

23 A Yeah. Harley called him back there one night. I
24 can't tell you the exact night, but that night that she
25 kept saying, "I feel like I'm dying; I feel like I'm

1 dying," she had went -- okay.

2 They -- Harley come back there with the blood
3 pressure cuff, not the nurse. Harley did. She brought
4 it back there because Angela said she didn't feel good
5 and she felt like she was dying.

6 They -- Harley was doing her blood pressure on her
7 left arm, sitting at the table at Big Dorm. And she
8 started having a seizure, like, and her tongue was
9 stuck out. She couldn't -- she could not put her
10 tongue back in her -- in her mouth.

11 And Harley -- Harley was, like, "Y'all catch her."
12 So me and Deanna Briscoe ran around the table to catch
13 her from falling, which that's not even our job, for
14 one. I mean, she was going to fall back in the floor.
15 She was seizing out.

16 And Harley called Mark on the radio, I'm guessing,
17 because he come back there. And by that time Angela
18 had kind of came to, and she was sitting up, but her
19 tongue was still sticking out.

20 Mark made the comment, he was, like -- he said,
21 "Put your tongue back in your mouth and go lay down."
22 He said, "We're going to get you took care of." That's
23 what he said. And if y'all have camera footage, y'all
24 can pull it back and see that that's what happened.

25 Q Okay. So you said --

1 A (The witness shook her head.)

2 I can't remember because whenever she put it on

3 her arm -- and it was, like -- because it's one of them

4 push -- push ones, whenever it was doing it, she

5 started having a seizure. So I can't -- I can't really

6 remember.

7 Q Okay. So -- and when you say she started having a

8 seizure --

9 A Um-hum.

10 Q -- what exactly was she doing? Can you describe

11 that?

12 A Well, her body was shaking. She was, like, going

13 backwards because it's, like, a table like this

14 (indicating) except for there's a bench part to it.

15 And, like, she was just shaking, and she started

16 falling backwards.

17 And that's when Harley was, like, "Somebody catch

18 her." And then that's whenever me and Deanna ran

19 around and caught her.

20 Q Okay. And then you think -- but you didn't see --

21 Harley called Mark Bryant.

22 A Yeah. Yeah, that's what I'm saying. I don't

23 know -- I mean, I guess she had to have called him on

24 the radio because, you know, you can't have phones back

25 there or anything. So I'm guessing she radioed him and

1 told him to come back.

2 Q Okay. Well, did y'all have -- is there any kind
3 of call button in the cell where she could have used
4 that to call --

5 A Yeah. Now, that's right. Yeah, there is a push
6 button right by the door. She could have hit that, but
7 I'm not sure.

8 Q Okay. But for -- regardless, Mark Bryant
9 responded and came back --

10 A (The witness nodded.)
11 Uh-huh.

12 Q -- to the cell.
13 And you said at that point -- where -- where
14 exactly was Mrs. Hulsey at that time?

15 A She was still sitting at the table. She had kind
16 of like come to a little bit right before he come back
17 in there, but her tongue was still sticking out of her
18 mouth. It was -- I don't know. I guess it was stuck.
19 I'm not sure.

20 Q Okay. So -- and then did Ms. Hulsey say anything?

21 A No. She was just -- she -- it's like she wasn't
22 there. It was -- it was the weirdest thing. I don't
23 know.

24 Q Okay. And so did Harley or Mark Bryant examine
25 her and start -- look at her in any way? I know you

1 said he took her -- put her tongue back in her mouth.

2 A Yeah.

3 Q But did he look at her or do anything else?

4 A (The witness shook her head.)

5 I'm not sure.

6 Q Okay. Did you hear any of the conversation

7 between, like, Harley and Mark as to what had happened?

8 A No.

9 Q Okay. Did you or -- I'm sorry. Was it Deanna?

10 Was that the other --

11 A (The witness nodded.)

12 Deanna Briscoe, uh-huh.

13 Q Okay. Did either of you talk to Mark Bryant about

14 what had happened?

15 A No. Mark told us to get out of the way whenever

16 he come back there because me and Deanna were still

17 standing behind her, standing behind Angela, in case,

18 you know, she fell backwards. And Mark was, like,

19 "Move out of the way."

20 Q Okay. And so when -- when he told Ms. Hulsey to

21 put her tongue back in her mouth and to -- and I'm

22 sorry. I don't want to put words in your mouth, but

23 did you say to go lie down?

24 A Yeah. He told her to put her tongue back in her

25 mouth and go lay down.